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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 WALTER SPURLOCK and ANDRE  
14 GUIBERT,

15 Plaintiffs,

16 v.

17 CITY AND COUNTY OF SAN  
FRANCISCO, AIRPORT COMMISSION OF  
18 THE CITY AND COUNTY OF SAN  
FRANCISCO, KEABOKA MOLWANE in his  
19 individual capacity and official capacity as  
Aviation Security and Regulatory Compliance  
20 Officer at the San Francisco International  
Airport, and JEFF LITTLEFIELD in his  
21 individual capacity and official capacity as  
Chief Operating Officer at San Francisco  
22 International Airport,

23 Defendants.  
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Case No. 3:23-cv-4429

**DECLARATION OF MOLLY J. ALARCON IN  
SUPPORT OF DEFENDANTS' REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF  
MOTION TO DISMISS THE FIRST  
AMENDED COMPLAINT**

## DECLARATION

I, Molly J. Alarcon, declare as follows:

1. I am an attorney duly licensed to practice law in California, and a Deputy City Attorney for the City and County of San Francisco assigned to represent Defendants the City and County of San Francisco, the Airport Commission of the City and County of San Francisco, Jeff Littlefield, and Doe 1 in the above-captioned case. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify competently to the contents of this Declaration.

2. The Charter of the City and County of San Francisco (the “S.F. Charter”) is a public record made available online in the American Legal Publishing’s Code Library.

3. S.F. Charter Article I, § 1.101 is available at [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-22#JD\\_1.101](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-22#JD_1.101)

4. S.F. Charter, Article IV, § 4.100 is available at [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-166](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-166)

5. S.F. Charter, Article IV § 4.102 is available at [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-181](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-181)

6. S.F. Charter, Article IV § 4.115 is available at [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-303](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-303)

7. S.F. Charter, Article IV § 4.126 is available at [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-366](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-366)

8. True and correct copies of these provisions, S.F. Charter, Article 1, § 1.101, and Article IV, §§ 4.100, 4.102, 4.115, and 4.126 are attached hereto as **Exhibit A**.

9. In their First Amended Complaint (“FAC”), Plaintiffs reference, but do not attach, a document entitled “TSA National Amendment: Centralized Revocation Database for Individual with Revoked Identification Media TSA-NA-21-01A.” FAC at ¶ 53. This is not a publicly available document because it is “sensitive security information” (“SSI”) not subject to public disclosure under federal regulations. 49 C.F.R. § 1520.5(a), (b)(1), and (b)(2). The Airport has a copy of this document, which will be filed under seal as **Exhibit B** to this Declaration, to allow for in-camera review by the Court.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct.

3 Executed this 18th day of December, 2023 in San Francisco, California.

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7 MOLLY J. ALARCON